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Before the FEDERAL COMMUNICATIONS COMMISSION DEC 12 1994 20554 COMMISSION Washington, D.C.

William Co. Tray In the Matter of Amendment of Section 73.202(b), MM Docket No. 94-113 Table of Allotments RM-8514 FM Broadcast Stations

To: Chief, Allocations Branch

(Cape Girardeau, Missouri)

REPLY COMMENTS OF KEVIN G. GREASER

Kevin G. Greaser (hereafter "Greaser"), by his counsel, hereby submits these reply comments to the COUNTERPROPOSAL of Scott City Broadcasters (hereafter "Scott"), the COMMENTS AND COUNTERPROPOSAL of Stephen W. Sikes (hereafter "Sikes") and the COUNTERPROPOSAL by Twin States Broadcasting, Inc. (hereafter "Twin"). In support of its proposal in this proceeding, Greaser submits the following.

Scott proposes the allocation of FM Channel 230A at Scott City, Missouri. Scott City is located approximately eight miles south of Cape Girardeau, Missouri, the community to which Greaser has requested the allotment of FM Channel 230A. Greaser continues to submit that the allotment of Channel 230A at Cape Girardeau is preferable for the reasons noted in his "Petition For Rule Making" and "Comments of Kevin G. Greaser". event the Commission were to allocate the FM Channel 230A to City, Greaser would submit an application for that Scott allocation and promptly build a station in the event he were No. of Copies rec'd granted a construction permit.

List A B C D E

- 2. Sikes proposes to allocate FM Channel 229A at Miner, Missouri. This allotment would apparently preclude the FM Channel 230A allocation to Cape Girardeau proposed by Greaser. Greaser does not believe that Sikes has shown Miner, Missouri to be anything but a "quite village" that is ineligible for an FM allotment under established Commission precedent. Accordingly, Greaser believes that the proposed Miner, Missouri allotment should be rejected by the Commission. In the alternative, the Commission should review its database to ascertain whether an alternative allotment is available for Miner, Missouri.
- 3. Twin proposes to change the existing FM Channel 284A allotment at Chaffee, Missouri to FM Channel 230A in order to allow it to up-grade the facilities of WKWT(FM), Union City, Tennessee, from FM Channel 285A to 284C2. The Twin proposal should also be rejected. Greaser is requesting a new FM channel allocation that will provide an additional FM broadcast service. Twin's proposal will not result in a new broadcast service, but will merely allow Twin to expand the service area for its existing station. Greaser submits that the public interest warrants the allocation of a new service over merely increasing the coverage area for an existing station.

Wherefore, based on the foregoing, Greaser reaffirms his support for the allocation of FM Channel 230A at Cape Girardeau, Missouri. In the alternative, he would apply for, and build, an FM station on Channel 230A in the event this channel were allocated to Scott City, Missouri.

Respectfully submitted,

Kevin G. Greaser

By:

Deffrey D. Southmayd

His (Attorney

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Date: December 12, 1994

CERTIFICATE OF SERVICE

I, Jeffrey D. Southmayd, do hereby certify that I have caused copies of the foregoing "Reply Comments of Kevin G. Greaser" to be mailed by first class mail, postage pre-paid, on this 12th day of December, 1994, to the following:

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